

FISH & RICHARDSON P.C.

Frederick P. Fish
1855-1930

W.K. Richardson
1859-1951

5000 Bank One Center
1717 Main Street
Dallas, Texas
75201

Telephone
214 747-5070

Facsimile
214 747-2091

Web Site
www.fr.com

April 25, 2005

The Honorable Richard C. Casey
United States District Court for the
Southern District of New York
United States Courthouse
500 Pearl Street, Room 1950
New York, New York 10007-1312

ECF

Re: In re Terrorist Attacks on September 11, 2001, MDL No. 1570 (RCC)

FR

This document relates to:

AUSTIN
BOSTON
DALLAS
DELAWARE
NEW YORK
SAN DIEGO
SILICON VALLEY
TWIN CITIES
WASHINGTON, DC

Ashton v. Al Qaeda Islamic Army, 02-CV-6977 (RCC)
Barrera v. Al Qaeda Islamic Army, 03-CV-7036 (RCC)
Burnett v. Al Baraka Inv. and Dev. Corp., 03-CV-5738 (RCC)
Cantor Fitzgerald v. Akida Bank Private Limited, 04-CV-7065 (RCC)
Continental Casualty Co. v. Al Qaeda, 04-CV-5970 (RCC)
Euro Brokers Inc. v. Al Baraka Inv. and Dev. Corp., 04-CV-7279 (RCC)
Federal Insurance v. Al Qaida, 03-CV-6978 (RCC)
New York Marine & General Ins. Co. v. Al Qaida, 04-CV-6105 (RCC)
O'Neill v. Al Baraka Inv. and Dev. Corp., 04-CV-1923 (RCC)
Salvo v. Al Qaeda Islamic Army, 03-CV-5071 (RCC)
Tremsky v. Osama bin Laden, 02-CV-7300 (RCC)
World Trade Center Properties LLC v. Al Baraka Inv. and Dev. Corp., 04-CV-7280 (RCC)

Dear Judge Casey:

To promote efficiency and prevent the Court from having to read twelve, twenty-five page memoranda in support of motions to dismiss, Defendant Sulaiman Abdul Aziz Al Rajhi ("Sulaiman Al Rajhi") intends to file one memorandum in support of his motion to dismiss that will concurrently address all of the complaints listed above. However, we believe that addressing the issues raised in twelve separate complaints and incorporating those issues into a single memorandum will require more than the twenty-five pages allowed under the Court's rules. Accordingly, Defendant Sulaiman Al Rajhi respectfully requests leave of Court to exceed the Court's twenty-five page limit for memoranda of law by a maximum of ten (10) pages so that he may submit a single, combined memorandum in support of a consolidated motion to dismiss him from all of the twelve complaints listed above.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 4-28-05

FISH & RICHARDSON P.C.

The Honorable Richard C. Casey
April 25, 2005
Page 2

Counsel for Plaintiffs in eleven of the twelve complaints have agreed to the requested extension in exchange for Sulaiman Al Rajhi's agreement to a reciprocal extension up to the actual number of additional pages used by Sulaiman Al Rajhi, should Plaintiffs require one. Despite repeated attempts to contact counsel for Plaintiffs in the *Tremsky* action, however, counsel for Sulaiman Al Rajhi has been unable to obtain comment, either positive or negative, regarding this requested extension from *Tremsky*'s counsel. Although Sulaiman Al Rajhi has no reason to believe that *Tremsky*'s counsel would oppose the requested extension to which all other Plaintiffs' counsel have agreed, the Court's impending **April 29, 2005** deadline for filing a motion to dismiss requires Sulaiman Al Rajhi to bring this matter to the attention of the Court before receiving confirmation of *Tremsky*'s agreement. Accordingly, Sulaiman Al Rajhi respectfully requests that the Court grant him a maximum 10-page extension to the page limit for memoranda of law in support of a dismissal motion.

Respectfully submitted,



John M. Helms

Application is denied
Court rules counsel to meet
25 page limit

cc: All Counsel (via e-mail)

SO ORDERED.

Dated: April 27, 2005.

BY THE COURT:



The Honorable Richard C. Casey
United States District Court for the
Southern District of New York